

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JEFFREY CROSS, and  
PAMELA CROSS

Plaintiff,

V.

EQUITYEXPERTS.ORG, LLC,  
d/b/a EQUITY EXPERTS

Defendants.

CIVIL ACTION FILE  
NO. 1:17-cv-03804-AT-JCF

## DECLARATION OF JACQUELINE GALOFARO

The undersigned hereby makes the following declaration pursuant to 28 U.S.C. § 1746:

1.

My name is Jacqueline Galofaro. I have personal knowledge of the facts set forth in this Declaration and know them to be true and correct. I am over the age of eighteen (18) years old, am suffering no disabilities, and am competent to execute this declaration.

2.

I am a Vice President and the General Counsel of EquityExperts.Org, LLC (“Equity Experts”). I am a graduate of the Thomas M. Cooley Law School and

have practiced law in Michigan since 2013. I am a member in good standing of the Michigan bar. In my position with Equity Experts, I am in charge of Equity Experts' legal affairs.

3.

From March 29, 2017 until September 20, 2018, Equity Experts' resident agent was Michael Novak located at its registered office, 2000 Town Center, Suite 1900, #1120, Southfield, Michigan 48075. As of September 20, 2018, Equity Experts' resident agent remained Michael Novak, with a registered office located at 2391 Pontiac Road, Auburn Hills, Michigan 48326 and a mailing address for the registered office located at 6632 Telegraph Road #339, Bloomfield Hills, Michigan 48301.

4.

I have reviewed the Returns of Service filed by Plaintiffs in this case. It appears that Plaintiffs purported to serve the summons and complaint in this action on Danielle Williams at 2000 Town Center, Ste. 1900, Southfield, Michigan 48075 and on Candice Jones and Alexis Smith at 2391 Pontiac Rd., Auburn Hills, Michigan 48326.

5.

Alexis Smith was formerly employed as a marketing assistant for Equity Experts and was never authorized to accept service of process on behalf of Equity Experts. Alexis Smith is not and has never been an officer, resident agent, director, trustee, or person in charge of an office or business establishment of Equity Experts.

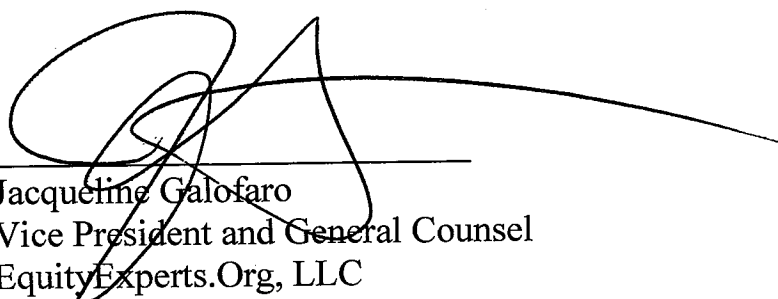
6.

Neither Danielle Williams nor Candice Jones has ever been employed by Equity Experts. Neither has ever been authorized to accept service of process on behalf of Equity Experts. Neither is or ever has been an officer, resident agent, director, trustee, or person in charge of an office or business establishment of Equity Experts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 5<sup>th</sup>, 2018.

By:



Jacqueline Galofaro  
Vice President and General Counsel  
EquityExperts.Org, LLC